

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: Tribune Company Fraudulent Conveyance
Litigation

Consolidated Multidistrict Action

11-md-02296 (WHP)
12-mc-02296 (WHP)

This Document Relates to:
12-cv-02652 (WHP)
12-cv-00064 (WHP)
12-cv-00555 (WHP)

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Leland H. Chait, Esq. and the law firm of Sugar Felsenthal Grais & Hammer LLP (collectively, “*SugarFGH*”), on their own behalf, submits this *Motion to Withdraw as Counsel of Record* (the “Motion”) for ECHOTrade, LLC (“*ECHOTrade*”). In support of the Motion, SugarFGH states as follows:

1. ECHOTrade retained SugarFGH as its counsel in these proceedings, originally filed in the United States District Court for the Northern District of Illinois, under case numbers 11-cv-03754 and 11-cv-5155 (the “*Northern District Cases*”).

2. These proceedings were transferred to this Court on January 23, 2012. Leland Chait, one of SugarFGH’s attorneys, filed appearance on behalf of ECHOTrade in the Northern District Cases, which were also transferred to this Court under case numbers 12-cv-00064 and 12-cv-00555, respectively. *See* [0064 Dkt. 321]; [0555 Dkt. 88.]

3. As a result of these cases being transferred to this Court, ECHOTrade wished to employ new counsel.

4. ECHOtrade retained, as its substitute counsel, Douglas R. Hirsch, Esq. and the law firm of Sadis & Goldberg LLP. Mr. Hirsch filed an appearance on ECHOtrade's behalf in these proceedings on October 9, 2012 in case number 12-cv-02652. *See* [2652 Dkt. 456.]

5. SugarFGH's withdrawal as counsel for ECHOtrade will not cause prejudice to ECHOtrade, as ECHOtrade has already selected new counsel who has appeared in these cases, has been given adequate notice of this Motion, and has raised no objection to SugarFGH's withdrawal as their counsel.

Wherefore, SugarFGH requests that the Court enter an order allowing it to withdraw as counsel for ECHOtrade in these consolidated matters, and any other relief the Court deems appropriate under the circumstances.

Dated: February 20, 2013

**SUGAR FELSENTHAL GRAIS
& HAMMER LLP**

/s/ Leland Chait
One of its attorneys

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